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November 13, 2001

PUBLIC VERSION

Carmen Suro-Bredie
Chair, Trade Policy Staff Committee
Office of the United States Trade Representative **VIA E-MAIL**
AND
600 17th Street, N.W. **CERTIFIED MAIL**
Washington, D.C. 20508

Attn: Gloria Blue, Executive Secretary

Re: Action Under §203 of the Trade Act of 1974 With Regard to Imports of Certain Steel; Request by the Magellan Corporation for Exclusion of Hot-Rolled and Cold-Finished Bar Steel Products

Dear Ms. Suro-Bredie:

On behalf of Magellan Corporation of Northbrook, Illinois in connection with a solicitation by your office on October 25, 2001 and as contained in a notice in the *Federal Register*, 66 *Fed. Reg.* 54321, *et seq.* (October 26, 2001), we hereby request that the products listed in the attached statement be excluded from any restriction on imports that may be ordered by the President in accordance with the referenced matter. This submission is being made via e-mail as well by certified mail to ensure that it is properly and timely received.

We hereby request confidential treatment in accordance with 15 C.F.R. §2003.6 for the information in the attached for which confidentiality is claimed. A non-confidential summary is being included. Confidential treatment is requested for the reasons set forth below.

The information provided in Exhibit 11 consists of letters supplied by end users of the products for which exclusion is

sought, stating the unavailability of the product from U.S. producers. This is highly confidential information from third parties, obtained with the understanding that it would be treated as a trade secret. Further, these letters revel internal information of these third parties, including confidential information as to their sources of supply and materials used in the manufacture of their products.

Respectfully submitted,

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By: 

David J. Craven

Attorneys for Magellan Corporation

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DAR/rs

Encl.

PUBLIC VERSION

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of:	Evaluation of Options for Action Under §203
Certain Steel Products	

PUBLIC VERSION

REQUEST TO EXCLUDE CERTAIN SBQ STEEL BAR FROM IMPORT RELIEF UNDER SECTION 203 BY

MAGELLAN INTERNATIONAL TRADING CORPORATION

Riggle and Craven
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Chicago, Illinois 60603-1403
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Counsel:

David A. Riggle
David J. Craven

Date: November 13, 2001

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Exclusion Request By Magellan International Trading Corporation

I. INTRODUCTION AND SUMMARY

This request for exclusion of certain Special Bar Quality ("SBQ") Steel Bar Products from import relief under Section 203 is being submitted by Magellan International Trading Corporation in response to the request for comments of October 25, 2001 and as published at 66 *Fed. Reg.* 54321, *et seq.* (October 26, 2001).

A. Executive Summary

It is requested that the following types of steel bar products be excluded from any import relief ordered pursuant to Section 203 on the basis that they are not produced, or not produced in sufficient quantities, to serve the domestic marketplace. The types of Hot-Rolled and Cold-Finished Bar products are:

- SBQ Bar of 6.5 inches or over in diameter;
- SBQ Bar of greater than 4.0 inches;
- Thermally Treated SBQ Bar of greater than 4.0 inches;
- Aircraft Quality SBQ Bar;
- Sharp Cornered Steel Square SBQ Bar.

Letters from U.S. users stating that certain types of steel are not available from domestic mills are included as Exhibit 11.

Within the hot-rolled and cold-finished bar segments there are numerous subproducts which the U.S. industry simply does not

produce, or cannot produce in sufficient quantity or quality to serve the United States market. Any remedy which imposes quantitative restrictions on imports must not impose restrictions on these products as these would not help the U.S. industry, would impose additional costs and other disruptions on U.S. end users of these products and otherwise disrupt the economy.

II. PRODUCTS

A. SBQ Bar of 6.5 Inches or Over in Diameter, Classified Under HTS Items 7214.99.00.15, 7214.99.00.30, 7214.99.00.60, 7214.99.00.75, 7228.30.20.00, 7228.30.20.50, and 7228.40.00.00

i. There Is Only One U.S. Producer of SBQ Bar Greater than 6.5 Inches in Diameter

There is only one producer in the United States of SBQ bar greater than 6.5 inches in diameter. This producer is the Timken Company of Canton, Ohio. Timken, however, cannot produce product in sufficient quantity to satisfy demand. Timken is a major producer of end products using its steel. As such, Timken needs a significant portion of its own product to supply its internal needs. More importantly, Timken has a disincentive to sell steel to its end-product competitors at a reasonable price. This enables Timken to obtain maximum prices for its products.

Further, because of its position in the market, Timken has frequently used an allocation process whereby it gives priority to its existing customers, limits the amounts of steel that they

can purchase during periods of peak demand, and limits the access of customers of former competitors to its steel upon the foreclosing of supply from those competitors.

ii. No Other Producer Has the Physical Capability to Produce SBQ Bar Greater than 6.5 Inches in Diameter

The U.S. industry, with the exception of Timken, is simply incapable of producing SBQ bar greater than 6.5 inches in diameter. There are two requirements to produce this product, neither of which can be met by any other U.S. producer.

a. Metallurgical Requirements

SBQ steel consists of a large number of steel types which must meet specific metallurgical requirements. In order to meet these requirements, the steel producer must be able to engage in ladle refining, vacuum degassing and other processes. The two named processes, which cannot be performed by mini-mills, are necessary to produce the steel needed in SBQ bar. Further, these steel grades must be subject to significant laboratory analysis and testing during the production process. Without such testing, the steel cannot meet the physical and, equally important, the certification requirement. This requires SBQ mills have metallurgical laboratories and equipment such as ultrasonic testers. Again, the mini-mills simply do not have either the laboratory capacity or the testing equipment to perform such analysis. This requirement essentially eliminates

all US steel producers except for RTI, Timken and Mac.[1]

b. Rolling and Melting Capability

In addition to the ability to produce the underlying grade of steel, the plant must also have the ability to produce bottom poured ingots and the rolling mill must have the physical ability to roll product to sufficient size. This requirement eliminates all U.S. producers except for Timken. Simply put, in order to produce bar greater than 6.5 inches in diameter the rolling mill must possess the physical capability to produce bar of this size. No U.S. producer, except for Timken, has a rolling mill large enough to produce bar of 6.5 inches and over. This is not an issue which can be addressed by changing the rollers, or otherwise "slightly modifying the rolling mill". The only way to produce this product would be the addition of a multi-million dollar rolling mill.

iii. Timken Cannot Meet Demand By Itself

Timken simply cannot meet the U.S. demand for SBQ bar with a diameter of greater than 6.5 inches. By Magellan's estimate, the total market for this product in the U.S. is about 600,000 tons.[2] Timken's **total** steel production capability of this

[1] Some U.S. producers have argued that they could import foreign ingots made from the proper grade of steel and roll it into bar. In addition to the limitations inherent in the rolling mills, this would be a far more costly procedure entailing additional production due to the need for heating as well as significant additional transportation. While theoretically possible, it is economically, and thus practically, not feasible.

[2] See the attached chart (Exhibit 2) with the estimated domestic production through 2000. For 2001, the domestically produced SBQ bar of 6.5" and over is produced only by Timken, as all other domestic

category is estimated to be about 220,000 tons.

iv. Production and Consumption

Attached as Exhibit 1 is a chart with the estimated U.S. production, U.S. consumption, and imports from 1996 to 2000. This information has been obtained from public sources, and thus may be subject to modification. Projected information cannot be made at this time due to the many variables.

v. Names of Producers

Attached as Exhibit 2 is a list of producers in both the U.S. and the world.

vi. Substitutes

There are no realistic substitutes for most of these products. While steel forgings could theoretically be used in some instances, as a practical matter it would be so uneconomic that it is not possible.

B. U.S. Producers Cannot Satisfy Demand for SBQ Bar Greater than 4.0 Inches in Diameter, Classified Under HTS Items 7214.99.00.15, 7214.99.00.30, 7214.99.00.60, 7214.99.00.75, 7228.30.20.00, 7228.30.20.50, and 7228.40.00.00

i. U.S. Producers Have Insufficient Physical Capability to Produce SBQ Bar Greater than 4.0 Inches in Diameter

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mills with the capability to produce such bar have dropped out of the market. Since it is estimated that Timken's annual large bar (6.5" and over) production is approximately 220,000 tons in a current marketplace estimated to be about 600,000 tons, there is a domestic shortfall in capacity of about 380,000 tons. Because much of Timken's production of large SBQ bar is used internally, the amount which could be sold to third parties is even less.

The U.S. industry, with the exception of Timken and RTI, Inc., and to a lesser extent MAC, is simply incapable of producing SBQ bar greater than 4.0 inches in diameter. As with SBQ bar with a diameter greater than 6.5 inches in diameter, there are two requirements to produce this product, neither of which can be met by any other US producers.

a. Metallurgical Requirements

The metallurgical requirements are the same as those for SBQ bar greater than 6.5 inches in diameter and the same physical restrictions apply.

b. Rolling and Melting Capability

In addition to the ability to produce the underlying grade of steel, the plant must also have the ability to produce bottom poured ingots and the rolling mill must have the physical capability to roll product to sufficient size. This requirement eliminates all other US producers except for Timken, RTI and MAC.[3] Simply put, in order to produce bar greater than 4.0 inches in diameter the rolling mill must possess the physical capability to produce bar of this size. No U.S. producers, again, except for Timken, RTI and MAC, have a sufficiently large rolling mill. This is not an issue which can be addressed by changing the roll, or otherwise "slightly modifying the rolling

[3] None of the mini-mills can produce SBQ bar due to the fact that they do not use the bottom poured ingot method necessary to get the correct chemical characteristics, and that they do not have large rolling mills.

mill". The rolling mill itself cannot produce the product.

ii. Timken, RTI and MAC Cannot Meet Demand By Themselves

As has been discussed by many entities, Timken, RTI and MAC simply cannot meet the US demand for SBQ bar with a diameter of greater than 4.0 inches.

Timken, as discussed above, has many significant demands on the limited quantities of steel that it produces, including a substantial in-house demand for steel to produce end products.

RTI has had serious financial problems which have imperilled its ability to supply product on a regular basis, which also has had an impact on the quality of that product. Further, RTI only makes a limited quantity of bar larger than 4.0 inches, and cannot produce bar larger than 6.25 inches.

MAC Steel focuses its production on the heavy truck and automotive market and does not sell steel through many of the normal distribution channels (for example, MAC does not sell to steel service centers). Further, as with RTI, it primarily produces smaller sizes and produces only a limited number of sizes above 4.0 inches.

iii. Production and Consumption

Attached as Exhibit 1 is a chart with the estimated U.S. production, U.S. consumption, and imports from 1996 to 2000. This information has been obtained from public sources, and thus

may be subject to modification. Projected information cannot be made at this time due to the many variables.

iv. Names of Producers

Attached as Exhibit 3 is a list of producers in both the U.S. and the world.

v. Substitutes

There are no realistic substitutes for most of these products. While steel forgings could theoretically be used in some instances, as a practical matter it would be so uneconomic that it is not possible.

C. No US Producer Has Physical Capability to Produce Thermally Treated SBQ Bar Greater than 4 Inches in Diameter, Classified Under HTS Items 7214.99.00.15, 7214.99.00.30, 7214.99.00.60, 7214.99.00.75, 7228.30.20.00, 7228.30.20.50, and 7228.40.00.00

i. Basis for Exclusion Request

To produce thermal treated SBQ bar greater than 4 inches in diameter requires two things: SBQ bar of the requisite size and the ability to thermally treat the product. As discussed above, SBQ bar greater than 4.0 inches in diameter is simply not available in sufficient quantity in the US market. But even if it were, the capacity to thermally treat the product is limited by the lack of sufficient thermal treatment capacity. Much of the thermal treatment capacity in the U.S. was possessed by Green River and CSC, Ltd., entities which are no longer operating. The remainder of the capacity is that of Timken and RTI. The ability of these companies to produce thermally

treated product is even more limited in sizes over 4.0 inches.

ii. Production and Consumption

Attached as Exhibit 1 is a chart with the estimated U.S. production, U.S. consumption, and imports from 1996 to 2000. This information has been obtained from public sources, and thus may be subject to modification. Projected information cannot be made at this time due to the many variables.

iii. Names of Producers

Attached as Exhibit 4 is a list of producers in both the U.S. and the world.

iv. Substitutes

There are no realistic substitutes for most of these products. While steel forgings could theoretically be used in some instances, as a practical matter it would be so uneconomic that it is not possible.

D. Aircraft Quality SBQ Bar, Classified in HTS Items 7214.99.00.15, 7214.99.00.30, 7214.99.00.60, 7214.99.00.75, 7228.30.20.00, 7228.30.20.50, and 7228.40.00.00

i. Basis for Exclusion Request

There is an insufficient supply of aircraft quality SBQ bar meeting AMS specifications available in the United States from domestic sources. AMS-grade aircraft steel must be produced to very exacting standards using specific production processes. With the exception of Timken, no U.S. producer can make this

product. In order to produce such steel, the producer must have the ability to engage in ladle refining and must also have the ability to degas the steel. Further, the producer must have laboratory and testing facilities. Finally, due to actual AMS specifications, continuous cast steel cannot qualify.[4] One testing requirement is that the first, last and middle billet be tested. In a continuous cast process, such testing simply cannot be conducted as there are no first, last and middle billets to test.

ii. Production and Consumption

Attached as Exhibit 1 is a chart with the estimated U.S. production, U.S. consumption, and imports from 1996 to 2000. This information has been obtained from public sources, and thus may be subject to modification. Projected information cannot be made at this time due to the many variables.

iii. Names of Producers

Attached as Exhibit 5 is a list of producers in both the U.S. and the world.

iv. Substitutes

There is no realistic substitute for this product.

E. Sharp Cornered Steel Square SBQ Bars in Sizes 2.75 Inches and Larger, Classified in HTS Items 7214.91.00.15, 7214.91.00.60, 7214.91.00.90, and 7228.30.80.50.50

[4] Continuous casting is the method used by all U.S. mills but Timken.

i. Basis for Exclusion Request

U.S. producers, with very limited exceptions, simply cannot produce the grade and size of steel required to produce this product. Further, the profile of this product is not one which is presently produced by any U.S. mill.

ii. Production and Consumption

Attached as Exhibit 1 is a chart with the estimated U.S. production, U.S. consumption, and imports from 1996 to 2000. This information has been obtained from public sources, and thus may be subject to modification. Projected information cannot be made at this time due to the many variables.

iii. Names of Producers

Attached as Exhibit 6 is a list of producers in both the U.S. and the world.

iv. Substitutes

There are no realistic substitutes for most of these products. While steel forgings could theoretically be used in some instances, as a practical matter it would be so uneconomic that it is not possible.

F. Cold-Finished SBQ Bar Greater Than 6.5 Inches in Diameter, Classified in HTS Items 7215.50.00.15, 7215.50.00.60, 7228.50.10.10, 7228.50.50.50, 7228.50.10.20, 7228.50.10.60, and 7215.50.00.90

Any one of many cold-finishing processes can be performed by many U.S. entities. Most of these cold finishers are not

producers of the underlying steel, but rather purchase hot-rolled SBQ bar as stock and cold finish this stock into cold-finished bar. Accordingly, the limitations on cold-finished product are the limitations on the underlying upstream hot-rolled bar product. As discussed above, there is insufficient capacity in the U.S. market. See Exhibit 7 for a list of producers.

G. Cold-Finished SBQ Bar Greater Than 4 Inches in Diameter, Classified in HTS Items 7215.50.00.15, 7215.50.00.60, 7228.50.10.10, 7228.50.50.50, 7228.50.10.20, 7228.50.10.60, and 7215.50.00.90

The considerations that apply to cold-finished SBQ bar with a diameter greater than 6.5 inches also apply to this product. See Exhibit 8 for a list of producers.

H. Cold-Finished SBQ Bar Subjected to Thermal Processing, Classified in HTS Items 7215.50.00.15, 7215.50.00.60, 7228.50.10.10, 7228.50.50.50, 7228.50.10.20, 7228.50.10.60, and 7215.50.00.90

The limitations on hot-rolled SBQ bar subject to thermal processing apply equally to the stock used by U.S. cold finishers of such steel. To the extent that the stock is unavailable, the finished product also cannot be produced. See Exhibit 9 for a list of producers.

I. Cold-Finished SBQ Bar Which Meets AMS Specifications for Aircraft Quality, Classified Under HTS Items 7215.50.00.15, 7215.50.00.60, 7228.50.10.10, 7228.50.50.50, 7228.50.10.20, 7228.50.10.60, 7215.50.00.90

The limitations on hot-rolled SBQ bar which meets AMS specifications apply equally to the stock used by the U.S. cold

finishers of such steel. To the extent that the stock is unavailable, the finished produce also cannot be produced. See Exhibit 10 for a list of producers.

III. CONCLUSION

For the reasons set forth above we request that the products listed be excluded from any import restrictions. Attached as Exhibit 11 are letters from several end users stating that they are unable to obtain the specified steel products from domestic suppliers.

Respectfully submitted,

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By:

David J. Craven

Attorneys for Magellan Corporation

Exhibit 1

	1996	1997	1998	1999	2000
Domestic Shipments	6,999,067	8,153,264	8,189,205	7,898,049	7,900,633
Imports (all countries)	1,150,603	1,167,370	1,307,359	1,359,840	1,583,915
Imports- % of Market	14.12%	12.52%	13.77%	14.69%	16.70%
Imports- Canada				914,795	876,551
Imports (less Canada)				445,045	707,364
Imports- % of Market (less Canada)				4.81%	7.46%

All figures are net tons unless indicated to the contrary

Carbon and Alloy, Hot Rolled, Special Bar Quality, Steel Bars in Diameters 4.000" to under 6.500"					
Domestic Shipments (estimated)	1,399,813	1,630,653	1,637,841	1,579,610	1,580,127
Imports (all countries) (estimated)	287,651	291,842	326,840	339,960	395,979
Carbon and Alloy, Hot Rolled, Special Bar Quality, Steel Bars in Diameters 6.500" and larger					
Domestic Shipments (estimated)	349,953	407,663	409,460	394,902	395,032
Imports (all countries) (estimated)	230,121	233,474	261,472	271,968	316,783
Carbon and Alloy, Hot Rolled, Special Bar Quality, Steel Bars which are Thermally Treated					
Domestic Shipments (estimated)	2,099,720	2,445,979	2,456,762	2,369,415	2,370,190
Imports (all countries) (estimated)	575,302	583,685	653,680	679,920	791,958
Carbon and Alloy, Hot Rolled, Special Bar Quality, Steel Bars which are Aircraft Quality by AISI Definition					
Domestic Shipments (estimated)	139,981	163,065	163,784	157,961	158,013
Imports (all countries) (estimated)	80,542	81,716	91,515	95,189	110,874

Exhibit 2

Hot-Rolled SBQ Bar Greater than 6.5 Inches in Diameter

Domestic Producers

Name	City	State
The Timken Co.	Canton	Ohio

Foreign Producers

Name	Country
Acos Villares S.A.	Brazil
Atlas Specialty Steels	Canada
Daye Special Steel Co. Ltd.	China
Trinecke Zelezarny a.s.	Czech Republic
Imatra Steel Oy Ab	Finland
Ascometal	France
Thyssen Stahl AG	Germany
Diosgyori Acelmuvek Rt	Hungary
Ispat Profiles Ltd.	India
Mahindra Ugine Steel Co. Ltd.	India
Acciaierie Bertoli Safau SpA	Italy
Aichi Steel Corporation	Japan
Daido Steel Co. Ltd.	Japan
Kia Steel Co. Ltd.	South Korea
Serov Iron & Steel Works	Russia
Volgograd Steel Works	Russia
GSB Acero S.A.	Spain
Sidenor S.A.	Spain
Inexa Profil AB	Sweden
Asil Celik Sanayi ve Ticaret	Turkey
Dneprospetsstal Electromet. Works	Ukraine
Istil-DMZ	Ukraine
Corus Group plc.	United Kingdom

Exhibit 3

Hot-Rolled SBQ Bar Greater than 4.0 Inches in Diameter

Domestic Producers

Name	City	State
MacSteel	Jackson	Michigan
Republic Technologies International	Fairlawn	Ohio
The Timken Co.	Canton	Ohio

Foreign Producers

Name	Country
Byelorussian Steel Works	Belarus
Acos Villares S.A.	Brazil
Atlas Specialty Steels	Canada
Daye Special Steel Co. Ltd.	China
Trinecke Zelezarny a.s.	Czech Republic
Imatra Steel Oy Ab	Finland
Ascometal	France
BGH Edelstahl	Germany
Thyssen Stahl AG	Germany
Georgsmarienhutte GmbH	Germany
Diosgyori Acelmuvek Rt	Hungary
Ispat Profiles Ltd.	India
Mahindra Ugine Steel Co. Ltd.	India
Acciaierie Bertoli Safau SpA	Italy
Acciaierie di Bolzano SpA	Italy
Lucchini Siderurgica SpA	Italy
Aichi Steel Corporation	Japan
Daido Steel Co. Ltd.	Japan
Kia Steel Co. Ltd.	South Korea
Industrias CH, S.A.	Mexico
Mechel	Russia
Oskol Electric Steel Works	Russia
Petrostal Metallurgical Works	Russia
Serov Iron & Steel Works	Russia
Volgograd Steel Works	Russia
Zlatoust Iron & Steel Works	Russia
SZ Metal Ravne d.o.o.	Slovenia
Iscor Ltd.	South Africa
GSB Acero S.A.	Spain
Sidenor S.A.	Spain
Inexa Profil AB	Sweden
Gloria Material Technology Corp.	Taiwan
Asil Celik Sanayi ve Ticaret	Turkey
Dneprospetsstal Electromet. Works	Ukraine
Istil-DMZ	Ukraine
Corus Group plc.	United Kingdom

Exhibit 4

Thermally Treated SBQ Bar Greater Than 4 Inches in Diameter

Domestic Producers

Name	City	State
MacSteel	Jackson	Michigan
Republic Technologies International	Fairlawn	Ohio
The Timken Co.	Canton	Ohio

Foreign Producers

Name	Country
Acindar Industria Argentina	Argentina
Acos Villares S.A.	Brazil
Siderurgica de Medellin S.A.	Colombia
Trinecke Zelezarny a.s.	Czech Republic
Imatra Steel Oy Ab	Finland
Ascometal	France
BGH Edelstahl	Germany
Thyssen Stahl AG	Germany
Georgsmarienhutte GmbH	Germany
Mahindra Ugine Steel Co. Ltd.	India
Acciaierie Bertoli Safau SpA	Italy
Acciaierie di Bolzano SpA	Italy
Lucchini Siderurgica SpA	Italy
Kia Steel Co. Ltd.	South Korea
Industrias CH, S.A.	Mexico
COST SA Targoviste	Romania
SZ Metal Ravne d.o.o.	Slovenia
GSB Acero S.A.	Spain
Sidenor S.A.	Spain
Inexa Profil AB	Sweden
Ovako Steel AB	Sweden
Gloria Material Technology Corp.	Taiwan
Asil Celik Sanayi ve Ticaret	Turkey
Corus Group plc.	United Kingdom

Exhibit 5

Aircraft Quality SBQ Bar

Domestic Producers

Name	City	State
Republic Technologies International	Fairlawn	Ohio
The Timken Co.	Canton	Ohio

Foreign Producers

Name	Country
Ascometal	France
BGH Edelstahl	Germany
Thyssen Stahl AG	Germany
Georgsmarienhutte GmbH	Germany
Acciaierie Bertoli Safau SpA	Italy
Acciaierie di Bolzano SpA	Italy
Lucchini Siderurgica SpA	Italy
Aichi Steel Corporation	Japan
Daido Steel Co. Ltd.	Japan
Industrias CH, S.A.	Mexico
SZ Metal Ravne d.o.o.	Slovenia
GSB Acero S.A.	Spain
Sidenor S.A.	Spain
Inexa Profil AB	Sweden
Gloria Material Technology Corp.	Taiwan
Corus Group plc.	United Kingdom

Exhibit 6

Sharp Cornered Steel Square SBQ Bars in Sizes 2.75 Inches and Larger

Domestic Producers

Name	City	State
None		

Foreign Producers

Name	Country
Acos Minas Gerais S.A.	Brazil
Sidenor S.A.	Spain
Niagara Corporation	United Kingdom

Exhibit 7

Cold-Finished SBQ Bar Greater Than 6.5 Inches in Diameter

Domestic Producers

Name	City	State
None		

Foreign Producers

Name	Country
Trinecke Zelezarny a.s.	Czech Republic
Imatra Steel Oy Ab	Finland
Ascometal	France
Thyssen Stahl AG	Germany
Acciaierie Bertoli Safau SpA	Italy
Sidenor S.A.	Spain
Inexa Profil AB	Sweden
Corus Group plc.	United Kingdom

Exhibit 8

Cold-Finished SBQ Bar Greater Than 6.5 Inches in Diameter

Domestic Producers

Name	City	State
Republic Technologies International	Fairlawn	Ohio

Foreign Producers

Name	Country
Atlas Specialty Steels	Canada
Trinecke Zelezarny a.s.	Czech Republic
Imatra Steel Oy Ab	Finland
Ascometal	France
BGH Edelstahl	Germany
Thyssen Stahl AG	Germany
Georgsmarienhutte GmbH	Germany
Mahindra Ugine Steel Co. Ltd.	India
Acciaierie Bertoli Safau SpA	Italy
Acciaierie di Bolzano SpA	Italy
Lucchini Siderurgica SpA	Italy
Industrias CH, S.A.	Mexico
SZ Metal Ravne d.o.o.	Slovenia
GSB Acero S.A.	Spain
Sidenor S.A.	Spain
Inexa Profil AB	Sweden
Corus Group plc.	United Kingdom

Exhibit 9

Cold-Finished SBQ Bar Subjected to Thermal Processing

Domestic Producers

Name	City	State
MacSteel	Jackson	Michigan
Republic Technologies International	Fairlawn	Ohio
The Timken Co.	Canton	Ohio

Foreign Producers

Name	Country
Acindar Industria Argentina	Argentina
Acos Villares S.A.	Brazil
Trinecke Zelezarny a.s.	Czech Republic
Imatra Steel Oy Ab	Finland
Ascometal	France
BGH Edelstahl	Germany
Thyssen Stahl AG	Germany
Georgsmarienhutte GmbH	Germany
Mahindra Ugine Steel Co. Ltd.	India
Acciaierie Bertoli Safau SpA	Italy
Acciaierie di Bolzano SpA	Italy
Lucchini Siderurgica SpA	Italy
Kia Steel Co. Ltd.	South Korea
Industrias CH, S.A.	Mexico
COST SA Targoviste	Romania
SZ Metal Ravne d.o.o.	Slovenia
GSB Acero S.A.	Spain
Sidenor S.A.	Spain
Inexa Profil AB	Sweden
Ovako Steel AB	Sweden
Gloria Material Technology Corp.	Taiwan
Corus Group plc.	United Kingdom

Exhibit 10

Aircraft Quality Cold-Finished SBQ Bar

Domestic Producers

Name	City	State
Republic Technologies International	Fairlawn	Ohio
The Timken Co.	Canton	Ohio

Foreign Producers

Name	Country
Ascometal	France
BGH Edelstahl	Germany
Thyssen Stahl AG	Germany
Georgsmarienhutte GmbH	Germany
Acciaierie Bertoli Safau SpA	Italy
Acciaierie di Bolzano SpA	Italy
Lucchini Siderurgica SpA	Italy
Industrias CH, S.A.	Mexico
SZ Metal Ravne d.o.o.	Slovenia
GSB Acero S.A.	Spain
Sidenor S.A.	Spain
Inexa Profil AB	Sweden
Gloria Material Technology Corp.	Taiwan
Corus Group plc.	United Kingdom

CONFIDENTIAL
EXHIBIT 11

LETTERS FROM END USERS
UNABLE TO SOURCE DOMESTICALLY

Exhibit Not Susceptible to Summarization